

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

John T. Metcalf, et al.

Plaintiffs,

v.

Sophocles N. Zoullas, et al.,

Defendants.

11 Civ. 3996 (AKH) (HBP)

JOINDER IN DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Defendants Sophocles N. Zoullas, Alexis P. Zoullas, Alan S. Ginsberg, and nominal defendant Eagle Bulk Shipping Inc. (the "Corporate Defendants") hereby join (this "Joinder") in the Motion for Summary Judgment dated April 1, 2013 (Docket # 46) (the "Motion") filed by Defendants Douglas P. Haensel, Jon Tomasson, Joseph M. Cianciolo, David B. Hiley, Thomas B. Winmill, and Forrest E. Wylie ("the Outside Directors"), as well as all other supporting materials filed in connection therewith (collectively, the "Motion Papers").

The Corporate Defendants hereby join, adopt, and incorporate herein by reference all of the arguments and authorities contained in the Motion Papers (including, but not limited to, all declarations and exhibits referenced therein).

In connection with this Joinder, the Corporate Defendants reserve their rights to be heard at any future hearing on this matter on the grounds set forth in the Motion Papers, as well as to file reply papers on the Motion.

WHEREFORE, upon the bases set forth in the Motion Papers, the Corporate Defendants respectfully request that that the Court grant them summary judgment on all claims.

New York, New York
April 1, 2013

Respectfully submitted,

SEWARD & KISSEL LLP

By: s/ Bruce G. Paulsen

Bruce G. Paulsen
Jeffrey M. Dine
Seward & Kissel LLP
One Battery Park Plaza
New York, NY
Tel: (212) 574-1533
paulsen@sewkis.com
dine@sewkis.com
*Attorneys for Defendants Sophocles N.
Zoullas, Alexis P. Zoullas,
Alan S. Ginsberg, and Nominal Defendant
Eagle Bulk Shipping Inc.*

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